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March 30, 2018

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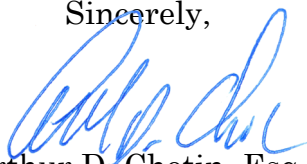
**RE: No. 17-965: DONALD J. TRUMP, PRESIDENT OF THE UNITED STATES, *ET AL.* V.
STATE OF HAWAII, *ET AL.***

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* PEN America and others in Support of Respondents referenced above contains **4,954** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

As a member of the Supreme Court Bar, I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,



Arthur D. Chotin, Esq.
Principal